

Exhibit B

BLANK ROME LLP

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in his Capacity as Trustee and Foreign
Representative for the Debtor*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

LARISA MARKUS,

Chapter 15

Case No. 19-10096 ()

Debtor in a Foreign Proceeding.

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**NOTICE OF FILING AND HEARING ON VERIFIED PETITION UNDER
CHAPTER 15 OF THE UNITED STATES BANKRUPTCY CODE AND
NOTICE PURSUANT TO FED. R. BANKR. P. 9017 AND FED R. CIV. P. 44.1**

PLEASE TAKE NOTICE, on January [], 2019, Yuri Vladimirovich Rozhkov (the “Foreign Representative”), the trustee and foreign representative of Larisa Markus (the “Debtor” or “Ms. Markus”) in Ms. Markus’ pending insolvency proceeding (the “Russian Insolvency Proceeding”) under the Federal Law № 127-FZ “On Insolvency (Bankruptcy)” (the “Russian Bankruptcy Law”), by United States counsel, Blank Rome LLP, filed a *Verified Petition* (the “Verified Petition”) *under Chapter 15 of title 11 of the United States Code* (the “Bankruptcy Code”) *for Recognition of a Foreign Main Proceeding and Official Form Petition* (the “Official Form Petition,” collectively, with the Verified Petition, the “Petition”) commencing a chapter 15 case ancillary to the Russian Insolvency Proceeding and seeking recognition of such foreign proceeding as a “foreign main proceeding” and relief in aid of the Russian Insolvency Proceeding

in the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) with respect to Ms. Markus.

PLEASE TAKE FURTHER NOTICE, that a copy of the Official Form Petition is attached hereto, along with: (i) the lists required to be filed with the Petition pursuant to Bankruptcy Rule 1007(a)(4); (ii) the Verified Petition; (iii) the Declarations of Yuri Vladimirovich Rozhkov in Support of the Verified Petition required to be filed pursuant to section 1515 of the Bankruptcy Code; and (iv) the Declaration of Sergey S. Sokolov, the Foreign Representative’s Russian Counsel, in Support of Recognition Hearing (collectively the “Supporting Documents”).

PLEASE TAKE FURTHER NOTICE, that pursuant to the *Order Scheduling Hearing on Verified Chapter 15 Petition and Specifying Form and Manner of Notice of Hearing* (the “Scheduling Order”), a copy of which is attached hereto, the Bankruptcy Court has scheduled a hearing on _____, **2018** at __:00 __.m. (ET). before the Honorable _____, in Room _____ of the Bankruptcy Court, One Bowling Green, New York, New York 10004 U.S.A. (the “Hearing”).

PLEASE TAKE FURTHER NOTICE, that, pursuant to Local Rule 2002-4, at the Hearing the Bankruptcy Court may order the scheduling of a case management conference to consider the efficient administrative of this case.

PLEASE TAKE FURTHER NOTICE, that any party in interest wishing to submit a response or objection to the Petition or the relief requested by the Foreign Representative must do so pursuant to the Bankruptcy Code and the Local and Federal Rules of Bankruptcy Procedure, including, without limitation, Federal Rules of Bankruptcy Procedure Rule 1011, in writing and setting forth the bases therefore, and such response or objection must be filed with the Office of the Clerk of the Court, Room 534, One Bowling Green, New York, New York 10004-1408; and

served on the attorneys for the Foreign Representative, (Blank Rome LLP, 405 Lexington Avenue, New York, New York 10174-0208 U.S.A., Attn: Ira L. Herman and Philip M. Guffy), so as to be received **on or before 4:00 p.m. New York Time on _____, 2019.**

PLEASE TAKE FURTHER NOTICE, that the response or objection to be filed with the Office of the Clerk of the Court must be filed; (i) electronically by registered users of the Bankruptcy Court's electronic case filing system in accordance with General Order M-242 of the Bankruptcy Court for the Southern District of New York, a copy of which may be viewed on the Bankruptcy Court's website, www.nysb.uscourts.gov; and (ii) by all other parties in interest on a CD-ROM, with two hard copies provided to the Chambers of the Honorable _____ United States Bankruptcy Judge, United States Bankruptcy Court, One Bowling Green, New York, New York 10004 U.S.A.

PLEASE TAKE FURTHER NOTICE, that all parties in interest opposed to the Petition or the Foreign Representative's request for relief must appear at the Hearing at the time and place set forth above.

PLEASE TAKE FURTHER NOTICE, that the Hearing may be adjourned from time to time without further notice other than an announcement in open court at the Hearing of the adjourned date or dates or any further adjourned hearing.

PLEASE TAKE FURTHER NOTICE, that Foreign Representative intends to raise issues pertaining to foreign law, specifically Russian Federal Law N^o 127-FZ "On Insolvency (Bankruptcy)" and related Russian laws, in connection with the Petition: (i) recognizing the Russian Insolvency Proceeding as a foreign main proceeding pursuant to chapter 15 of the Bankruptcy Code and the Foreign Representative as the foreign representative under sections 1509 and 1517 of the Bankruptcy Code; (ii) granting automatic relief pursuant to section 1520 of the

Bankruptcy Code; (iii) granting other and additional relief pursuant to sections 1507 and 1521(a) and (b) of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that if no response or objection is timely filed and served as provided above, the Bankruptcy Court may grant the recognition and relief requested by the Foreign Representative without further notice. Copies of the Petition and the Supporting Documents will be made available upon request at the office of the Foreign Representative's United States counsel at the address below:

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